State of Vermont

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August 4, 2000

IKE LEWIS
ECC INTERNATIONAL
PO BOX 330
SYLACAUGA AL 35150

RE: Site Management Activity Completed, Former Dutton Lumber Property, Brandon, Vermont (Site #95-1864)

Dear Mr. Lewis:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has reviewed the July 19, 1999, soil investigation report prepared by Jeff Kelley, in which a petition is made for giving the site a SMAC (Site Management Activity Completed) designation. Given the information contained within this report, as well as in the site file, the SMS has determined that a SMAC designation is appropriate for this site. This decision is detailed below.

Environmental investigative work was conducted following the discovery of contamination during the removal of six (6) underground storage tanks (USTs) on July 19, 1995. The contamination was found in the shared tank pit for four (4) of the USTs. Contamination was most concentrated around a 1,000-gallon gasoline UST and a 550-gallon lacquer thinner UST. All contamination, as measured using a photoionization detector (PID), was excavated from around the lacquer thinner UST. Laboratory analysis of the lacquer thinner UST contents indicated that the product was principally comprised of acetone, 2-butanone, benzene, ethylbenzene, toluene, and xylenes. Approximately three (3) cubic yards of contaminated soils from around the lacquer thinner UST were stockpiled and polyencapsulated onsite. All petroleum contaminated soils found around the heating oil and gasoline USTs were backfilled, since the extent of contamination was unknown.

On July 20, 1995, four (4) test pits were excavated to better define the area of contamination. Each pit was dug until the groundwater table was encountered, at a depth of about 12 feet below ground surface. Excavated soils were screened with a PID, and a groundwater sample was collected from each pit for laboratory analysis of volatile organic compounds. The only test pit containing any detectable PID readings was the one located at the former 1,000-gallon gasoline UST location. The highest PID reading was 30 parts per million (ppm). The groundwater sample from this pit contained one contaminant of concern, 1,2,4-trimethylbenzene at a concentration of 14 μg/L. This concentration exceeded the Vermont Health Advisory of 5 μg/L, which was in effect at that time.

Three (3) groundwater monitoring wells were subsequently installed and sampled to better assess the direction of groundwater flow, and to obtain more reliable groundwater data. No volatile organic compounds were detected in any of these wells. In June of 1999, these monitoring wells were properly abandoned.

The site's soil stratigraphy is comprised of heavy clays from the Vergennes Series. Interestingly, soils removed from this property were used for capping material for a landfill, and had a hydraulic conductivity of 1×10^{-7} cm/sec.

(Over)

The three (3) cubic yard soil stockpile was thin spread onsite in May 1997, since there was no longer any evidence of contamination by PID, or from olfactory and visual observations. Since the source of the contamination was from a "non-petroleum" (i.e., lacquer thinner) UST, this action was beyond the scope of the *"Agency Guidelines for Petroleum Contaminated Soil and Debris."* To ensure that contaminants posing a risk to human health or the environment were not inadvertently spread, four (4) shallow soil samples were collected from the disposal area. Each sample was screened with a PID, and then composited for laboratory analysis. One sample did contain a detectable PID reading of 3.2 ppm, but the laboratory results indicated that no volatile organic compounds, e.g., acetone, 2-butanone, benzene, toluene, etc., were present.

The potential sensitive receptor survey conducted by Jeff Kelley indicated that the area is served by a municipal water supply. The nearest surface water is the Neshobe River, approximately 0.3 miles distant.

Based on the current conditions at this site, the SMS has determined that this site is now eligible for a SMAC designation. This means that the SMS has concluded the following:

- the six (6) petroleum and non-petroleum USTs have been removed from the ground, and are no longer a continuing source of petroleum contamination at this site;
- any residual soil or groundwater contamination is limited to the immediate vicinity of the former UST area and will be naturally attenuated over time; and
- any residual contamination does not pose an unacceptable risk to human health or the environment.

Based on the above, it appears that the contamination was confined to the former UST locations and does not pose an unreasonable risk to human health and safety or to the environment. Therefore, the SMS is assigning this site a SMAC designation. This designation does not release ECC International of any past or future liability associated with the contamination remaining in the ground from the removed USTs. It does, however, mean that the SMS is not requesting any additional work at this time. If you have any questions or comments, please feel free to contact either me or Matt Moran at 802-241-3888.

Sincerely,

George Desch, Chief
Sites Management Section

cc: Brandon Selectboard
Brandon Health Officer
DEC Regional Office
Jeff Kelley, Consulting Hydrogeologist
Jim Purdy, Geomapping Associates, Ltd.

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